

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE

SHAREN GRIMES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2316-CV23933
	)	Division 17
SABRE INDUSTRIES, INC.,	)	
	)	
Defendant.	)	

**NOTICE OF ATTORNEY'S CHANGE OF ADDRESS**

COMES NOW (Leah M. Mason/Melissa L. Steed), counsel for Plaintiff, and notifies the Court of the change of address of the law firm of Edelman & Thompson, LLC, to **4250 Main St., Suite 500, Kansas City, Missouri 64111**, effective **October 25, 2023**. The firm's telephone number, facsimile number and email addresses will remain the same.

Respectfully submitted,

EDELMAN & THOMPSON, L.L.C.

/s/ Leah M. Mason  
LEAH M. MASON MO Bar # 40942  
3100 Broadway, Suite 1400  
Kansas City, Missouri 64111  
(816) 561-3400  
(816) 561-1664 (Fax)  
lmason@etkclaw.com - e-mail

ATTORNEYS FOR PLAINTIFF

**CERTIFICATION UNDER RULE 55.03(A)**

Pursuant to Rule 55.03(a), the undersigned certifies that she signed an original of this pleading and that an original of this pleading shall be maintained for a period of not less than the maximum allowable time to complete the appellate process.

/s/ Leah M. Mason  
Attorney for Plaintiff

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE

SHAREN GRIMES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2316-CV23933
	)	Division 17
SABRE INDUSTRIES, INC.,	)	
	)	
Defendant.	)	

**AMENDED NOTICE OF ATTORNEY'S CHANGE OF ADDRESS**

COMES NOW Leah M. Mason, counsel for Plaintiff, and notifies the Court of the change of address of the law firm of Edelman & Thompson, LLC, to **4520 Main St., Suite 500, Kansas City, Missouri 64111**, effective **October 25, 2023**. The firm's telephone number, facsimile number and email addresses will remain the same.

Respectfully submitted,

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/s/ Leah M. Mason  
Attorney for Plaintiff



# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: CORY LEE ATKINS	Case Number: 2316-CV23933
Plaintiff/Petitioner: SHAREN GRIMES	Plaintiff's/Petitioner's Attorney/Address LEAH MARIE MASON EDELMAN & THOMPSON LLC 3100 BROADWAY SUITE 1400 KANSAS CITY, MO 64111
Defendant/Respondent: SABRE INDUSTRIES, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Pers Injury-Vehicular	

DAVID L. MARSHAK  
Sheriff, Jefferson County, MO

SEP 28 2023


RECEIVED

(Date File Stamp)

## Summons in Civil Case

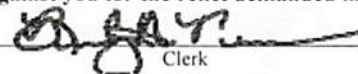
**The State of Missouri to:** SABRE INDUSTRIES, INC.  
Alias:

SRV RA LARRY D NANCE  
747 SUN PARK DRIVE  
FENTON, MO 63026

**COURT SEAL OF**  
  
**JACKSON COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

13-SEP-2023  
Date

  
Clerk

Further Information:

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.  
☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with a person at least 18 years of age residing therein.

☒ (for service on a corporation) delivering a copy of the summons and petition to Robin Kakta (name) Director HR (title).

☐ other \_\_\_\_\_

Served at 242 Sun Park Fenton (address)  
in Jefferson (County/City of St. Louis), MO, on 9/29/23 (date) at 1130 (time).

Printed Name of Sheriff or Server

(Seal)

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

## Sheriff's Fees

Summons	\$ <u>20</u>
Non Est	\$ _____
Sheriff's Deputy Salary	\$ <u>10.00</u>
Supplemental Surcharge	\$ <u>22.50</u> ( _____ miles @ \$. _____ per mile)
Mileage	\$ <u>52.50</u>
<b>Total</b>	\$ <u>105.00</u>

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

10/13

AM notations

at 10:00 AM

10/13/23



# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: CORY LEE ATKINS	Case Number: 2316-CV23933
Plaintiff/Petitioner: SHAREN GRIMES	Plaintiff's/Petitioner's Attorney/Address LEAH MARIE MASON EDELMAN & THOMPSON LLC 3100 BROADWAY SUITE 1400 KANSAS CITY, MO 64111
Defendant/Respondent: SABRE INDUSTRIES, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Pers Injury-Vehicular	(Date File Stamp)

## Summons in Civil Case

**The State of Missouri to:** SABRE INDUSTRIES, INC.  
**Alias:**

SRV RA: JEFF CITY FILING  
222 E DUNKLIN ST STE 102  
JEFFERSON CITY, MO 65101

**COURT SEAL OF**  
  
**JACKSON COUNTY**

**You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.**

21-SEP-2023  
Date

  
Clerk

Further Information:

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☐ (for service on a corporation) delivering a copy of the summons and petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

\_\_\_\_\_  
Printed Name of Sheriff or Server

\_\_\_\_\_  
Signature of Sheriff or Server

(Seal) **Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

**Sheriff's Fees**

Summons	\$ _____
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Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	\$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
INDEPENDENCE, MISSOURI

SHAREN GRIMES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2316-CV23933
	)	
SABRE INDUSTRIES, INC.,	)	Division 17
	)	
Defendant.	)	

**MEMORANDUM TO DEPARTMENT OF CIVIL RECORDS**  
**INSTRUCTIONS FOR ALIAS SUMMONS**

   PRIVATE PROCESS

  X   CIVIL PROCESS

  X   ISSUE ALIAS SUMMONS TO DEFENDANT: **Sabre Industries, Inc.**  
**a/k/a Sabre Communications**  
**Corporation**  
**Reg. Agt. Jeff City Filing**  
**222 E. Dunklin St. Ste. 102**  
**Jefferson City, MO 65101**

                    Cole                      
County of Service

CASE CONTINUED TO: \_\_\_\_\_

☐ PREPARE TRANSCRIPT OF JUDGMENT ☐ AUTHENTICATED ☐ CERTIFIED ☐ RECORD AS LIEN  
☐ W/ LETTER

**REQUESTED BY**

Leah M. Mason                    MO Bar # 40942  
ATTORNEY & BAR NO.

/s/ Leah M. Mason  
SIGNATURE

3100 Broadway, Suite 1400  
ADDRESS

(816) 561-3400  
PHONE

Kansas City                    MO                    64111  
City                    State                    Zip

9/20/2023  
Date

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

**SHAREN GRIMES,**

**PLAINTIFF(S),**

**VS.**

**CASE NO. 2316-CV23933  
DIVISION 17**

**SABRE INDUSTRIES, INC.,**

**DEFENDANT(S).**

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE  
AND ORDER FOR MEDIATION**

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NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **CORY LEE ATKINS** on **09-JAN-2024** in **DIVISION 17** at **09:00 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16<sup>th</sup> Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16<sup>th</sup> Judicial Circuit web site at [www.16thcircuit.org](http://www.16thcircuit.org) after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

### **MEDIATION**

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

### **POLICIES/PROCEDURES**

Please refer to the Court's web page [www.16thcircuit.org](http://www.16thcircuit.org) for division policies and procedural information listed by each judge.

**/S/ CORY LEE ATKINS**

**CORY LEE ATKINS, Circuit Judge**

### **Certificate of Service**

This is to certify that a copy of the foregoing was electronic noticed, faxed, emailed and/or mailed or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

#### **Attorney for Plaintiff(s):**

LEAH MARIE MASON, EDELMAN & THOMPSON LLC, 3100 BROADWAY, SUITE 1400,  
KANSAS CITY, MO 64111

#### **Defendant(s):**

SABRE INDUSTRIES, INC.

Dated: 13-SEP-2023

BEVERLY A. NEWMAN  
Court Administrator



# IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: CORY LEE ATKINS	Case Number: 2316-CV23933
Plaintiff/Petitioner: SHAREN GRIMES	Plaintiff's/Petitioner's Attorney/Address LEAH MARIE MASON EDELMAN & THOMPSON LLC 3100 BROADWAY SUITE 1400 KANSAS CITY, MO 64111
Defendant/Respondent: SABRE INDUSTRIES, INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Pers Injury-Vehicular	(Date File Stamp)

## Summons in Civil Case

**The State of Missouri to: SABRE INDUSTRIES, INC.**  
**Alias:**  
 SRV RA LARRY D NANCE  
 747 SUN PARK DRIVE  
 FENTON, MO 63026

**COURT SEAL OF**  
  
**JACKSON COUNTY**

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13-SEP-2023  
 Date

  
 Clerk

Further Information:

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☐ (for service on a corporation) delivering a copy of the summons and petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

\_\_\_\_\_  
 Printed Name of Sheriff or Server

\_\_\_\_\_  
 Signature of Sheriff or Server

(Seal) **Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

**Sheriff's Fees**

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	\$ _____

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Circuit Court of Jackson County

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE

SHAREN GRIMES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	Division
SABRE INDUSTRIES, INC.,	)	
<b>SERVE REGISTERED AGENT:</b>	)	
Larry D. Nance	)	
747 Sun Park Drive	)	
Fenton, Missouri 63026	)	
	)	
Defendant.	)	

**PETITION FOR DAMAGES**

COMES NOW Plaintiff, Sharen Grimes, by and through her attorney of record, and for her  
Petition against the Defendant, sets forth, states, and avers as follows:

1. That Plaintiff Sharen Grimes is a resident of the State of Missouri residing at 1200 Sparrow, Odessa, Missouri 64076.
2. That Defendant Sabre Industries, Inc. is a Missouri corporation, active and in good standing in the State of Missouri, with its principal place of business at 747 Sun Park Drive, Fenton, Missouri 63026 and can be served on its registered agent at the above address.
3. That this Court has jurisdiction over the Defendant in that Defendant conducts and transacts business in the State of Missouri. Jurisdiction comports with the due process requirements of the Missouri and United States Constitutions.
4. Venue is proper in Jackson County, Missouri, pursuant to § 508.010 of the Missouri Revised Statutes, in that Plaintiff first suffered injury in this county.

5. That on or about December 5, 2022, Plaintiff was operating her vehicle in the Wal-Mart shopping area.

6. That Defendant's driver was operating Defendant's vehicle down a hill toward Plaintiff's vehicle.

7. That Defendant's vehicle collided with the rear of Plaintiff's vehicle.

8. That Defendant Sabre Industries, Inc. was the employer of Defendant's driver at the time of the above-referenced collision and Defendant's driver was acting within the course and scope of his employment at said time.

9. That Defendant Sabre Industries, Inc. as the employer of its driver is responsible for the actions of its employee based on a master-servant relationship or the doctrine of *respondeat superior*, joint venture and/or other doctrines revealed in discovery.

10. That Defendant through its agent driver had a duty to use the degree of care required under Missouri law and Defendant breached that duty and was thereby negligent.

11. That the above-referenced vehicular collision was caused in whole or in part by the negligence of Defendant Sabre Industries, Inc. through its agent driver in his failing to use the requisite degree of care in the operation of the vehicle at issue, including but not limited to the following:

- (a) Failing to keep a careful lookout;
- (b) Failing to keep his vehicle under proper control;
- (c) Failing to act after danger of collision was apparent;
- (d) Following too closely;
- (e) Colliding with the rear of Plaintiff's vehicle;

- (f) Defendant driver knew or by the use of the highest degree of care should have known that there was a reasonable likelihood of collision in time thereafter to have stopped, or swerved, or slackened speed, or sounded a warning, or slackened speed and swerved, or slackened speed and sounded a warning, or swerved and sounded a warning, but Defendant driver failed to do so.

12. In addition, Defendant is further negligent with respect to its hiring, supervision, and training of its driver. Said negligent acts further caused or contributed to cause Plaintiff injuries.

13. Similarly, Defendant caused or knowingly permitted its driver to drive its vehicle upon public roadways. At the time Defendant furnished its driver with a vehicle, it knew or should have known that its driver lacked the ability to safely operate the vehicle and therefore should not have been entrusted the driver with said vehicle.

14. That as a direct and proximate result of the negligence of Defendant, Plaintiff has been caused to experience and incur physical injury and/or aggravation to her neck, back and pelvis, along with medical expense, loss of enjoyment of life, permanent disability, pain and suffering, and mental anguish, said injuries being permanent, progressive and continuous in nature.

15. That as a further direct and proximate result of the negligence of Defendant, Plaintiff sustained medical bills and is reasonably certain to suffer in the future additional such losses as well as ongoing pain and suffering.

WHEREFORE, Plaintiff prays for judgment against Defendant for an amount in excess of \$25,000.00, together with all other relief that the Court deems just and proper, as well as costs and expenses incurred in the prosecution of said claim.



Respectfully submitted,

EDELMAN & THOMPSON, L.L.C.

/s/ Leah M. Mason  
LEAH M. MASON MO Bar # 40942  
3100 Broadway, Suite 1400  
Kansas City, Missouri 64111  
(816) 561-3400  
(816) 561-1664 (Fax)  
lmason@etkclaw.com - e-mail

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/s/ Leah M. Mason  
Attorney for Plaintiff

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE

SHAREN GRIMES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	Division
SABRE INDUSTRIES, INC.,	)	
<b>SERVE REGISTERED AGENT:</b>	)	
Larry D. Nance	)	
747 Sun Park Drive	)	
Fenton, Missouri 63026	)	
	)	
Defendant.	)	

**CERTIFICATE OF SERVICE**

COMES NOW Plaintiff, by and through undersigned counsel, and hereby certifies that *Plaintiff's Opening Interrogatories to Defendant* and *Plaintiff's First Request for Production of Documents to Defendant* were served contemporaneously with Plaintiff's *Petition* and *Summons*, and that said discovery will be provided to counsel for Defendant via e-mail in Word format upon request.

Respectfully submitted,

EDELMAN & THOMPSON, L.L.C.

/s/ Leah M. Mason  
LEAH M. MASON MO Bar # 40942  
3100 Broadway, Suite 1400  
Kansas City, Missouri 64111  
(816) 561-3400  
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\_\_\_\_\_  
/s/ Leah M. Mason  
Attorney for Plaintiff